

EXHIBIT 4

**REDACTED VERSION
OF DOCUMENT
SOUGHT TO BE SEALED**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

Case No. 17-cv-00939-WHA

-----x

WAYMO LLC,

Plaintiff,

- against -

UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC;

OTTO TRUCKING LLC,

Defendants.

-----x

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped 30(b)(6) Deposition

of GARY BROWN, taken by Defendants, held

at the offices of Morrison & Foerster LLP,
250 West 55th Street, at 9:59 a.m. on August
8, 2017, New York, New York, before Jineen
Pavesi, a Registered Professional Reporter,
Registered Merit Reporter, Certified Realtime
Reporter and Notary Public of the State of New York.

Job No. 2671217A

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1 A. That is correct. 10:49:45AM

2 Q. Are there any other 10:49:45AM

3 administrators? 10:49:46AM

4 A. Not that I know of. 10:49:51AM

5 Q. Has Mr. [REDACTED] been the 10:49:54AM

6 administrator of the SVN log since January 10:49:56AM

7 of 2015? 10:50:02AM

8 A. I don't believe so. 10:50:05AM

9 Q. Who has been the administrator 10:50:09AM

10 of the SVN log from January 2015 forward, 10:50:10AM

11 if not Mr. [REDACTED] 10:50:14AM

12 A. [REDACTED] was the previous 10:50:20AM

13 administrator. 10:50:22AM

14 Q. And when was [REDACTED] the 10:50:26AM

15 administrator for the SVN log? 10:50:30AM

16 A. I believe from the inception of 10:50:38AM

17 the server in early 2015 through the 10:50:39AM

18 summer, June or July, 2015 -- sorry, no, 10:50:46AM

19 June, July 2016. 10:50:55AM

20 Q. And after June or July of 2016, 10:51:00AM

21 [REDACTED] took on responsibilities 10:51:03AM

22 for administering the SVN log, is that 10:51:06AM

23 correct? 10:51:10AM

24 A. That is correct. 10:51:10AM

25 Q. You do not have access to the 10:51:22AM

1 SVN log in the ordinary course of 10:51:23AM

2 business, is that correct? 10:51:25AM

3 MR. BAKER: Objection to form. 10:51:29AM

4 A. That is correct. 10:51:31AM

5 Q. So as part of Waymo's 10:51:34AM

6 investigation, someone gave you a copy of 10:51:35AM

7 the SVN log, is that correct? 10:51:37AM

8 A. That is correct. 10:51:41AM

9 Q. And that person, the person who 10:51:44AM

10 gave you a copy of the SVN log was 10:51:46AM

11 [REDACTED] correct? 10:51:49AM

12 A. No. 10:51:53AM

13 Q. Who gave you a copy of the SVN 10:51:54AM

14 log? 10:51:56AM

15 MR. BAKER: I am going to 10:52:00AM

16 caution the witness not to reveal the 10:52:00AM

17 substance of any attorney-client 10:52:03AM

18 communication, but you can give a name. 10:52:04AM

19 A. [REDACTED] 10:52:07AM

20 Q. When did Mr. [REDACTED] give you 10:52:08AM

21 the SVN log? 10:52:10AM

22 MR. BAKER: You can give a 10:52:11AM

23 date. 10:52:12AM

24 A. February 21st, 20th or 21st, 10:52:13AM

25 2017. 10:52:25AM

1 Do you see that? 04:26:18PM

2 A. I do. 04:26:19PM

3 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

17 MR. BAKER: Objection to form. 04:27:05PM

18 A. Also, as a professional log 04:27:09PM

19 diver, I'll call myself, when we're doing 04:27:13PM

20 investigations, we don't keep things that 04:27:17PM

21 are not deemed explicitly relevant for 04:27:24PM

22 what we are trying to prove. 04:27:26PM

23 It is bad data stewardship, it 04:27:31PM

24 takes up space, and it makes noise. 04:27:34PM

25 Q. What were you asked to prove 04:27:36PM

C E R T I F I C A T I O N

I, Jineen Pavesi, a Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter and a Notary Public, do hereby certify that the foregoing witness, GARY BROWN, was duly sworn on the date indicated, and that the foregoing is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.

A handwritten signature in black ink that reads "Jineen Pavesi, RPR, RMR". The signature is written in a cursive, flowing style.

JINEEN PAVESI, RPR, RMR, CRR